

Brian A. Bender, Esq. (BAB-0218)
Harris Beach PLLC
100 Wall Street
New York, New York 10005
(212) 687-0100

Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SERGIO BARRAGAN;

Case No.:
07-CV-1469 (AKH)

Plaintiff,

-against-

CAPITAL PROPERTIES, INC, CITY OF NEW
YORK, COOPER SQUARE REALTY, INC., EMPIRE
STATE PROPERTIES, INC., GOTHAM ESTATE
LLC, JOSEPH MARTUSCELLO, LEFRAK
ORGANIZATION, INC., SAKELE BROTHERS,
L.L.C, SENEX GREENWICH REALTY
ASSOCIATES, LLC, TRINITY CENTRE, LLC, and
W ASSOCIATES LLC,

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

Defendants.

PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as
and for its response to the allegations set forth in the Complaint by Adoption (Check-Off
Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts
its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World
Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK

ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 10, 2007

Yours etc.,

HARRIS BEACH PLLC



Brian A. Bender, Esq. (BAB-0218)

HARRIS BEACH PLLC

Attorney for Defendant

LEFRAK ORGANIZATION, INC.

100 Wall Street, 23rd Floor

New York, New York 10005

(212) 687-0100

245292.1

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SERGIO BARRAGAN,

Case No.:
07-CV-1469 (AKH)

Plaintiff,

-against-

CAPITAL PROPERTIES, INC, ET AL.,

Defendants.

**NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT OF
LEFRAK ORGANIZATION, INC.**

HARRIS BEACH, PLLC
Attorneys for Defendant
LEFRAK ORGANIZATION, INC.
100 Wall Street, 23rd Floor
New York, New York 10005
(212) 687-0100